

NORTHEAST UTILITIES



THE CONNECTICUT LIGHT AND POWER COMPANY
WESTERN MASSACHUSETTS ELECTRIC COMPANY
HOLYOKE WATER POWER COMPANY
NORTHEAST UTILITIES SERVICE COMPANY
NORTHEAST NUCLEAR ENERGY COMPANY

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August 12, 1985

Docket No. 50-423
B11635

Director of Nuclear Reactor Regulation
Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

- References: (1) W. G. Council letter to B. J. Youngblood, Submittal of Draft Technical Specifications for Millstone Unit No. 3, dated December 7, 1984.
- (2) B. J. Youngblood letter to J. F. Opeka, Second Draft of Millstone 3 Technical Specifications, dated July 19, 1985.

Gentlemen:

Millstone Nuclear Power Station, Unit No. 3
Proposed Revisions to Draft Technical Specifications

In Reference 1, Northeast Nuclear Energy Company (NNECO) submitted draft technical specifications for the operation of Millstone Unit No. 3. This submittal included certain areas where NNECO deviated from the Westinghouse Standard Technical Specifications. In our discussion with the Staff on July 17, 1985, the Containment Systems Branch requested NNECO submit a proposed technical specification change with justification for the following:

- a) Spray Additive System Surveillance 4.6.2.3.d.
- b) Electric Hydrogen Recombiner Surveillance 4.6.4.2 b(2).
- c) Mechanical Vacuum Pumps 3.6.5.2.

Attached please find NNECO's proposed changes to the above Containment Systems draft technical specifications. We trust the accompanying justifications will resolve the Staff's concerns regarding the proposed revisions.

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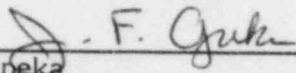
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If you have any questions, please contact our licensing representative directly.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY
et. al.

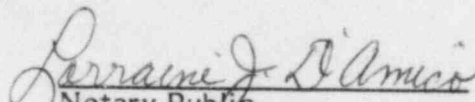
BY NORTHEAST NUCLEAR ENERGY COMPANY
Their Agent



J. F. Opeka
Senior Vice President

STATE OF CONNECTICUT)
) ss. Berlin
COUNTY OF HARTFORD)

Then personally appeared before me J. F. Opeka, who being duly sworn, did state that he is Senior Vice President of Northeast Nuclear Energy Company, an Applicant herein, that he is authorized to execute and file the foregoing information in the name and on behalf of the Applicants herein and that the statements contained in said information are true and correct to the best of his knowledge and belief.



Notary Public

My Commission Expires March 31, 1988

Millstone Nuclear Power Station, Unit No. 3
Proposed Revision to Draft Technical Specifications (Second Draft)
Containment Systems Branch

4.6.2.3 The Spray Additive System shall be demonstrated OPERABLE:

d. At least once per 5 years by verifying each solution flow rate (to be determined during preoperational tests) from the following drain connections in the Spray Additive System:

- | | | | |
|----|---------------------|---------------|----------|
| 1) | Drain line location | _____ + _____ | gpm, and |
| 2) | Drain line location | _____ + _____ | gpm. |

NNECO's Proposed Change:

NNECO requests the deletion of surveillance 4.6.2.3.d.

The Chemical Addition Tank/Refueling Water Storage Tank (CAT/RWST) system is aligned such that valves V-29 and V-32 are locked open and the CAT block valves MOV29A and MOV29B are closed. Currently surveillance 4.6.2.3.c requires the CAT Block valves actuate to their correct position once every 18 months, and surveillance 4.6.2.3.a requires verifying once per month that all locked open valves are in their correct position.

Since this is a gravity feed system and all valves in the system undergo surveillance as identified above, surveillance 4.6.2.3.d can be deleted.

Millstone Nuclear Power Station, Unit No. 3
Proposed Revision to Draft Technical Specification (Second Draft)
Containment System Branch

4.6.4.2 Each Hydrogen Recombiner System shall be demonstrated OPERABLE:

b. At least once per 18 months by:

- 2) Verifying through a visual examination that there is no evidence of abnormal conditions within the recombinder enclosure (i.e., loose wiring or structural connections, deposits of foreign materials, etc.), and

NNECO's Proposed Change:

NNECO proposes to modify this surveillance to preclude unnecessary dismantling of the hydrogen recombinder to confirm operability (this could be construed as a requirement from a literal interpretation of the specification). We propose that a more meaningful inspection be conducted which would complement the other tests/inspections contained in 4.6.4.2.b. The proposed specification would read:

4.6.4.

b. At least once per 18 months by:

- 2) Verifying through a visual examination of all external recombinder electrical connections that there is no evidence of abnormal conditions (i.e. loose wiring structural connections, deposits of foreign material, etc). and

Millstone Nuclear Power Station, Unit No. 3
Proposed Revision to Draft Technical Specifications (Second Draft)
Containment Systems Branch

3/4.6.5.2 Mechanical Vacuum Pumps

NNECO's Proposed Change:

NNECO requests the mechanical vacuum pumps be deleted from Millstone Unit 3 technical specifications. The primary function of the mechanical vacuum pumps is to maintain the reactor containment internal pressure at subatmospheric conditions during normal operation. The system is not a safety related system and is not required to perform any safety related function.

The only other function of the system is to serve as a backup purge system to the hydrogen recombiners in controlling the combustible gas concentration in the containment following a LOCA (in accordance with 10CFR50.44 & Reg. Guide 1.7). The hydrogen recombiner system consists of two 100% capacity trains that will ensure operability in the event of a single failure of any component. If both hydrogen recombiners should fail, which is a very remote possibility, the operation of the vacuum pumps would not be required for several weeks after a DBA, therefore, the mechanical vacuum system is not considered an engineered safety system.

Based on the above, we are requesting Section 3/4.6.5.2, Mechanical Vacuum Pumps, be deleted.